

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

A.A.R.P., et al., on their own behalf and on behalf
of others similarly situated,

Petitioners–Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case 1:25-cv-00059-H

**UNOPPOSED MOTION TO INTERVENE FOR THE
LIMITED PURPOSE OF SEEKING AMENDMENT
TO THE ORDER GRANTING THE PSEUDONYM MOTION**

1. AARP respectfully submits this motion to intervene for the limited purpose of seeking an amendment to the Order (ECF No. 9) granting the Motion to Proceed Under Pseudonyms filed by Petitioners-Plaintiffs A.A.R.P. and W.M.M. on April 16, 2025. (ECF No. 4, the “Pseudonym Motion”).

2. AARP is a nonprofit and nonpartisan 501(c)(4) organization that advocates for older Americans in a variety of political, social, and economic contexts.¹ AARP has no connection to “A.A.R.P.,” the initials of one of the Plaintiff-Petitioners.

3. This action was commenced on April 16, 2025, on behalf of two Petitioners-Plaintiffs by the American Civil Liberties Union Foundation and ACLU Foundation of Texas

¹ See <https://www.aarp.org/>.

(together, the “ACLU”). This is an immigration case involving the Alien Enemies Act and federal habeas corpus.

4. The Pseudonym Motion asked the Court to permit Petitioners-Plaintiffs to use their initials rather than their full names “because the complaint, declarations, and subsequent filings will contain highly sensitive and personal information about [their] immigration status [which] . . . might subject them to retaliatory removal from the United States[.]” (ECF No. 4 at 1). This Court granted the motion (ECF No. 9), and the current short form caption of the case is “*A.A.R.P. et al. v. Donald J. Trump et al.*” on various public websites, including the ACLU’s website.²

5. Unsurprisingly, this litigation has already received attention from the press and social media. It will surely continue to do so. AARP is concerned that the nomenclature adopted by the caption of this case will create substantial confusion among journalists and the public. Indeed, in the 72 hours since the litigation was filed, it has already resulted in numerous misplaced inquiries to AARP. Both the ACLU and AARP are prominent advocacy organizations on federal policies, albeit in very different domains.

6. Given this context, AARP seeks leave to intervene in this action for the limited purpose of seeking an amendment to the Order granting the Pseudonym Motion as it was presented by the ACLU. AARP asks the Court to amend its order so that (1) the Petitioners-Plaintiffs in the caption are ordered with W.M.M. appearing first, so that the short citation of the case name will be “*W.M.M. et al. v. Donald J. Trump, et al.*” and (2) change the abbreviation for “A.A.R.P.” to “A.R.P.”

7. These modest changes will cause no burden to Petitioners-Plaintiffs (who will remain anonymous), nor to the Government.

² See <https://www.aclu.org/cases/aarp-v-trump>.

8. The undersigned counsel for AARP engaged in good faith correspondence with counsel for the ACLU. Following telephonic discussions, the ACLU has informed AARP that it **does not oppose** AARP's request. Counsel for the Defendant is also unopposed.

9. To be clear, AARP takes absolutely no position regarding the subject matter of this litigation, nor Petitioners-Plaintiffs' right to proceed under pseudonyms. AARP's sole interest in this litigation is to avoid confusion that will likely burden both the ACLU and AARP, along with their respective memberships and the public.

Dated: April 19, 2025

By: /s/ Jennifer S. Freel

JACKSON WALKER LLP

Jennifer Freel
State Bar No. 24051327
100 Congress Avenue, Suite 1100
Austin, TX 78701
Telephone: (512) 236-2330
Email: jfreel@jw.com

Devanshi Somaya
State Bar No. 24102524
2323 Ross Avenue, Suite 600
Dallas, Texas 75201
Telephone: (214) 953-6000
Email: dsomaya@jw.com

ARENTFOX SCHIFF LLP

Brian Farkas, Esq.* (*pro hac vice
application forthcoming*)
1301 Avenue of the Americas, 42nd Floor
New York, New York 10019
Tel: (212) 492-3297
brian.farkas@afslaw.com

Attorneys for AARP

CERTIFICATE OF CONFERENCE

Pursuant to LR 7.1(a), counsel for AARP, Brian Farkas, conferred with counsel for the ACLU, who informed him that the ACLU is unopposed to the relief requested in this Motion. The undersigned conferred with George Padis, counsel for the Defendant, who is also unopposed to the relief requested in this Motion.

/s/ Jennifer S. Freel

Jennifer S. Freel

CERTIFICATE OF SERVICE

On April 19, 2025, I hereby certify that I electronically submitted the foregoing document with the Clerk of Court using the CM/ECF system which will serve the following attorneys of record via its notification system.

Brian Klosterboer
ACLU of Texas
PO Box 8306
Houston, TX 77288
713-942-8146 x1035
Fax: 713-942-8966
Email: bklosterboer@aclutx.org

Adriana Cecilia Pinon
ACLU Foundation of Texas
P.O. Box 8306
Houston, TX 77288
713-942-8146
Email: apinon@aclutx.org

Ashley Alcantara Harris
ACLU Foundation of Texas
P.O. Box 8306
Houston, TX 77288
713-942-8146
Email: aharris@aclutx.org

Charelle Lett
ACLU Foundation of Texas
PO Box 8306
Houston, TX 77288
713-942-8146
Email: clett@aclutx.org

Daniel Galindo
American Civil Liberties Union
Foundation
125 Broad Street
Ste 18th Floor
New York, NY 10004
646-905-8907
Email: dgalindo@aclu.org
ATTORNEY TO BE NOTICED

Lee Gelernt
American Civil Liberties Union
New York
125 Broad St., 18th Floor
New York
New York, NY 10004
212-549-2616
Fax: 212-549-2654
Email: lgelernt@aclu.org

Savannah Kumar
1018 Preston Road
Houston, TX 77002
713-942-8146
Fax: 713-942-8966
Email: skumar@aclutx.org

Thomas Paul Buser-Clancy
ACLU Foundation of Texas
P.O. Box 8306
Houston, TX 77288
713-942-8146
Email: tbuser-clancy@aclutx.org

Attorneys for Plaintiffs
George M Padis-DOJ
United States Attorney's Office
Northern District of Texas
1100 Commerce Street, Third Floor
Dallas, TX 75242
214-659-8645
Fax: 214-659-8811
Email: george.padis@usdoj.gov

Ann Cruce-Haag-DOJ
US Attorney's Office
1205 Texas Ave
7th Floor
Lubbock, TX 79401
806-472-7397
Fax: 806-472-7394
Email: ann.haag@usdoj.gov

Nancy Naseem Safavi
Department of Justice - Civil
Office of Immigration Litigation,

Appellate Section
PO Box 878, Ben Franklin Station
Washington, DC 20044
202-514-9875
Email: nancy.safavi@usdoj.gov

Attorneys for Defendants

/s/ Jennifer S. Freel
Jennifer S. Freel